

To: CN=Bill Keener/OU=R9/O=USEPA/C=US@EPA[]
Cc: []
Bcc: []
From: CN=Alexis Strauss/OU=R9/O=USEPA/C=US
Sent: Thur 4/12/2012 10:19:45 PM
Subject: Fw: Delta update
[BDCPRedFlagsTMHEdits.pdf](#)

fyi

----- Forwarded by Alexis Strauss/R9/USEPA/US on 04/12/2012 03:19 PM -----

From: Karen Schwinn/R9/USEPA/US
To: Jared Blumenfeld/R9/USEPA/US@EPA
Cc: Alexis Strauss/R9/USEPA/US@EPA, Laura Ebbert/R9/USEPA/US@EPA, Kelly Zito/R9/USEPA/US@EPA
Date: 04/12/2012 03:17 PM
Subject: Delta update

Jared -

I am on your calendar for a Delta update on April 17. In the meantime, I wanted you to know that we sent comments today on the BDCP to DWR and BOR. These will be posted on the BDCP website on Friday, along with comments from others.

This time around, we only reviewed the HCP itself (the "Conservation Measures", which are what they actually propose to do). We did not comment on the Effects Analysis since the water quality aspects of the EA are not yet ready.

I attached our comments. What we say, in a nutshell, is that the costs and benefits to aquatic life have not been sufficiently analyzed, and the negative impacts aren't sufficiently mitigated. A couple of examples:

- there's no plan for dealing with the poorer water quality expected in the South Delta as a result of decreasing exports there (i.e., no plan to minimize harmful algal blooms or low dissolved oxygen); and
- there's an insufficient (or at least unclear) investment in minimization of mercury methylation as wetlands are restored.

I don't expect much push back on our comments given that: (a) we were asked by lead agencies to comments; and (b) many comments from the lead agencies were more harsh. I do expect some press coverage when comments are posted on Friday. - KS

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----- Forwarded by Karen Schwinn/R9/USEPA/US on 04/12/2012 01:16 PM -----

From: Karen Schwinn/R9/USEPA/US
To: "King Moon, Laura" <lkmoon@water.ca.gov>, fbarajas@usbr.gov
Date: 04/12/2012 11:56 AM
Subject: review of BDCP draft

Federico and Laura -

As a member of the IMT, EPA has reviewed Chapter 3 of the draft BDCP. The attached document refines and replaces the version we sent to Federico on April 4. Our comments go beyond identifying "red flags", as we wanted to also offer suggestions we think might strengthen the document. I hope this is helpful.

If you have any questions, you may call me or Erin Foresman (916/930-3722). Thank you for the opportunity to read the document at this stage. - Karen

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